

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Richmond Division

IN RE:	)	
	)	
ANTIONETTE BARBER	)	Case No. 15-35388-KLP
	)	Chapter 13
Debtor	)	

**MOTION TO INCUR DEBT**

COMES NOW, the Debtor, by counsel, and as and for her Motion to Incur Debt, states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on October 20, 2015.
2. The Debtor has applied for and Hailey Buick GMC Truck, Inc. has approved a loan to the Debtor in the amount of \$20,000.00 plus interest at 17.99% per annum to be repaid with 72 equal monthly payments of \$400.00 for the purchase of a 2017 Buick Encore or similar vehicle.
3. The Debtor needs to purchase the referenced vehicle because Debtor current vehicle is having major mechanical issues and she needs a replacement vehicle to conduct normal daily business. She will be surrendering her current vehicle that was included in her Chapter 13 plan.
4. The purchase of the vehicle is in the best interest of the Debtor and will facilitate Debtor's ability to perform under the Chapter 13 Plan filed herein.
5. The Debtor's Chapter 13 Plan has been confirmed.

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, VA 23219  
(804) 225-9500 (phone)  
(804) 225-9598 (fax)  
*Counsel for Debtor*

WHEREFORE, the Debtor requests that the Court enter an Order approving the aforesaid loan on the terms stated herein, waive the 14-day stay pursuant to Fed. R. Bankr. Proc. 8002(a), and for such other relief as the Court may deem appropriate.

ANTIONETTE BARBER

By: /s/ James E. Kane  
Counsel

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, VA 23219  
(804) 225-9500 (phone)  
(804) 225-9598 (fax)  
*Counsel for Debtor*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 3, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record who have signed up to receive such notification and by first class mail to the parties on the attached list.

/s/ James E. Kane  
James E. Kane

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
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ANTIONETTE BARBER	)	Case No. 15-35388-KLP
	)	Chapter 13
Debtor	)	

**NOTICE OF MOTION**

The above Debtor has filed Motion to Incur Debt in the above matter.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, within twenty-one (21) days from the date of this Notice you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street  
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire  
Kane & Papa, P.C.  
1313 East Cary Street  
Richmond, Virginia 23219

- Attend a hearing scheduled for **June 16, 2021 at 12:00 p.m.** at **U.S. Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: June 3, 2021

ANTIONETTE BARBER

By: /s/ James E. Kane  
Counsel

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, VA 23219  
(804) 225-9500 (phone)  
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*Counsel for Debtor*

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/s/ James E. Kane  
James E. Kane

Label Matrix for local noticing

0422-3

Case 15-35388-KRH

Eastern District of Virginia

Richmond

Thu Jun 3 16:43:43 EDT 2021

United States Bankruptcy Court

701 East Broad Street

Richmond, VA 23219-1888

(p)JEFFERSON CAPITAL SYSTEMS LLC

PO BOX 7999

SAINT CLOUD MN 56302-7999

Internal Revenue Service

Centralized Insolvency Operation

P. O. Box 7346

Philadelphia, PA 19101-7346

UST smg Richmond

Office of the U. S. Trustee

701 East Broad St., Suite 4304

Richmond, VA 23219-1849

ARM

PO Box 129

Thorofare, NJ 08086-0129

Aarons, Inc.

P.O. Box 102746

Atlanta, GA 30368-2746

Aldous & Associates

PO Box 171374

Holladay, UT 84117-1374

Alliance One

Attn: Bankruptcy

Po Box 2449

Gig Harbor, WA 98335-4449

American Credit Accept

961 E Main St

Spartanburg, SC 29302-2185

Approved Cash Advance

6341 Jahnke Road

Richmond, VA 23225-4142

CJW Medical Center

PO Box 740760

Cincinnati, OH 45274-0760

Capital One

Attn: Bankruptcy

Po Box 30285

Salt Lake City, UT 84130-0285

Capital One Bank (USA), N.A.

PO Box 71083

Charlotte, NC 28272-1083

Cash 2 U Financial Services of VA LLC

6100 Midlothian Turnpike

Richmond, VA 23225-5922

Cash 2 U Payday Loans

6100 Midlothian Tnpk

Richmond, VA 23225-5922

Check City

2729 B West Broad Street

Richmond, VA 23220-1905

City of Richmond

Office of Finance

PO Box 26505

Richmond, VA 23261-6505

City of Richmond

Parking Enforcement

PO Box 26505

Richmond, VA 23261-6505

City of Richmond - City Hall

Room 109 Delinquent Taxes

900 East Broad Street

Richmond VA 23219-1907

City of Richmond - Dept. of Public Utilities

730 E. Broad Street, 5th Floor

Richmond, VA 23219-1861

Constance Ford

1321 Dance Street

Richmond, VA 23220-6116

Credit Collection Services

Two Wells Avenue

Dept. 9136

Newton Center, MA 02459-3225

Department of the Treasury

Internal Revenue Service

PO Box 7346

Philadelphia, PA 19101-7346

ESM Enterprises

PO Box 11128

Pensacola, FL 32524-1128

Fed Loan Serv

Po Box 60610

Harrisburg, PA 17106-0610

First Premier Bank

601 S Minnesota Ave

Sioux Falls, SD 57104-4868

First Virginia

PO Box 4115

Concord, CA 94524-4115

Golds Gym

c/o Conexion

PO Box 72609

Rosedale, MD 21237-8609

Internal Revenue Service

Centralized Insolvency Operation

Philadelphia, PA 19101-7346

LVNV Funding, LLC  
P.O. Box 10497  
Greenville, SC 29603-0497

LVNV Funding, LLC its successors and assigns  
assignee of MHC Receivables, LLC  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

MCV Collection Department  
PO Box 980462  
Richmond, VA 23298-0462

MCV HOSPITAL  
P O BOX 980462  
RICHMOND, VA 23298-0462

MCV Physicians  
PO Box 91747  
Richmond, VA 23291-9747

Midland Credit Management Inc as agent for  
Midland Funding LLC  
PO Box 2011  
Warren MI 48090-2011

National Credit Adjust  
Po Box 3023  
Hutchinson, KS 67504-3023

Navient Solutions, LLC. on behalf of  
Educational Credit Management Corporatio  
PO BOX 16408  
St. Paul, MN 55116-0408

Oakhurst Manor LP  
20 S. Auburn Ave.  
Richmond, VA 23221-2910

Parrish & Lebar  
5 East Franklin Street  
Richmond, VA 23219-2105

Premier Bankcard, Llc  
c o Jefferson Capital Systems LLC  
Po Box 7999  
Saint Cloud Mn 56302-7999

Progressive Advanced Insurance  
PO Box 55126  
Boston, MA 02205-5126

Protas, Spivok & Collins  
4300 East West Highway  
Suite 900  
Bethesda, MD 20814-4433

Receivable Management  
7206 Hull Street Rd Ste  
North Chesterfield, VA 23235-5826

Richmond Finance Company  
12560 PATTERSON AVENUE  
Henrico, VA 23238-6412

Richmond Finance Company  
PO Box 29657  
Richmond, VA 23242-0657

South Slope Associates  
3951-A STILLMAN PKWY  
Glen Allen, VA 23060-0000

Taxing Authority Consulting Sv  
PO Box 31800  
Henrico, VA 23294-1800

(p)ROBERT P MCINTOSH  
U S ATTORNEY S OFFICE  
EASTERN DISTRICT OF VIRGINIA  
919 E MAIN ST SUITE 1900  
RICHMOND VA 23219-4625

Virginia Commonwealth Univer.  
700 West Grace Street  
Suite 3300  
Richmond, VA 23284-9091

Virginia Commonwealth University  
VCU  
700 West Grace Street, 3rd Fl. Ste 3300  
PO Box 843054  
Richmond, VA 23284-3054

Wells Fargo Bank  
Box 5058 MAC P6053-021  
Portland, OR 97208-5058

Wells Fargo Bank  
PO Box 13765  
Roanoke, VA 24037-3765

West Creek Financial  
PO Box 5518  
Glen Allen, VA 23058-5518

Antionette Barber  
2712 Grantwood Court  
Richmond, VA 23225-1543

James E. Kane  
Kane & Papa, PC  
1313 East Cary Street  
P.O. Box 508  
Richmond, VA 23218-0508

Suzanne E. Wade  
341 Dial 877-996-8484 Code 2385911  
7202 Glen Forest Drive, Ste. 202  
Richmond, VA 23226-3770

End of Label Matrix  
Mailable recipients 56  
Bypassed recipients 0  
Total 56